

AMENDMENTS TO THE DRAWINGS:

The attached drawing sheet includes changes to Figure 1 and replaces the original sheet including this figure. Specifically, the legend "PRIOR ART" has been added to Figure 1.

Attachments:

- One (1) Replacement Sheet
- One (1) Annotated Sheet Showing Changes

REMARKS

Reconsideration and allowance of this application are respectfully requested. Claims 1-17 remain pending. By this communication, claim 17 is added and Figure 1 of the drawings is amended. Support for the subject matter recited in claim 17 can be found, for example, in paragraphs 29-31 of the disclosure.

In numbered paragraph 1 on page 2 of the Office Action, Figure 1 is objected to for failing to include a prior art legend. As noted above, Figure 1 of Applicant's drawing has been amended to address the Examiner's concerns. Withdrawal of this rejection, therefore, is respectfully requested.

In numbered paragraph 3 on page 2 of the Office Action, claims 1-8 and 11-14 are rejected under 35 U.S.C. §102(a) or (b) as anticipated by Applicant's alleged admitted prior art. Applicant respectfully traverses this rejection.

As variously shown in Figures 2-5, exemplary embodiments are directed to an insertion sensor electrode device that includes a probe holder 3 in which a probe 2 is installed. This device includes a safety adapter 25 as positioned between a probe protector tube 2 and a protective sleeve 105. The safety adapter 25 is distinguished by a collar 26 that is inward-oriented towards the symmetry axis 30 of the insertion sensor electrode device. The collar 26 surrounds a hexagonal portion 19 of the probe header 10, and in particular reaches over and preferably bears against a step 32 that lies between the hexagonal portion 19 and a part of the connector terminal 11 that protrudes from the portion 19. The collar 26 of the safety adapter 25 reaches into a recess 29 of the probe 2, where the recess is established by a gap between the step 32 and the sleeve 17 of the plug 12. In this manner, the probe 2 is retained in its installed position in the probe protector tube.

Applicant's claims broadly encompass the aforementioned features by reciting, among other elements, an insertion electrode device that comprises a safety adapter that is coupled to an end of a probe protector tube that is outside a container, wherein the safety adapter engages a recess of the sensor probe or reaches over a step of the sensor probe to secure the sensor probe against actual movement.

Applicant's Figure 1 shows a sensor probe that does not include the safety adaptor recited in claim 1. The Examiner, however, identifies an internal shoulder (i.e., ledge) as allegedly being analogous to Applicant's claimed safety adapter.

This shoulder ensures the functionality of the protector tube, which is "to receive, hold and guide a sensor probe", but does not prevent axial movement. The sensor probe can still move axially in a direction away from the container for the measuring medium. The Examiner alleges that the internal threading of the protector tube prevents axial movement of the probe (see Office Action, pg. 3). These statements are merely conclusory and speculative as the Examiner has not provided any documentary evidence that the threading as described can prevent axial movement. In fact, the Examiner's position appears rooted in the perceived mechanical relationship of the device features. One of ordinary skill would recognize that the Examiner's perception is contrary to the manner in which the protector tube and sensor structure are engaged.

In contrast, Applicant's claimed safety adapter "engages a recess of the sensor probe or reaches over a step of the sensor probe to secure the sensor probe against axial movement". With the safety adapter, the mobility of the sensor probe in its lengthwise direction is contained (see pgph [0036]).

To properly anticipate a claim, the document must disclose, explicitly or implicitly, each and every feature recited in the claim. See Verdegall Bros. v. Union Oil Co. of Calif., 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Aoyama fails to disclose, teach, or suggest every element recited in independent claims 1, 11, and 12, therefore these claims are not anticipated by *Aoyama*. For the reasons discussed in detail above, Applicant respectfully requests that the above stated rejections be withdrawn.

In numbered paragraph 12 on page 4 of the Office Action, claims 1-4 and 6-8 are rejected under 35 U.S.C. §102(b) for alleged anticipation by *Stevenson, Jr.* (U.S. Patent No. 4,176,032). Applicant respectfully traverses this rejection.

The *Stevenson* patent fails to disclose every element recited in Applicant's claims. Notably, the concept described in the *Stevenson* patent is not reasonably related to Applicant's claimed insertion electrode device such that one of ordinary skill would look to the *Stevenson* patent to achieve Applicant's claimed results. Rather, the *Stevenson* patent discloses the use of a sensor probe 10 that is supported on the lower end of a beam 12 whose other end is secured to a bracket that is anchored to a container or a tank. As shown in Figures 1-5, the sensor probe 10 is analogous to Applicant's claimed sensor probe such that the *Stevenson* patent cannot possibly disclose or suggest a probe protector tube and coupling as recited in Applicant's claims. In other words, the sensor probe 10 of the *Stevenson* patent could be fully inserted into Applicant's claimed device. Thus, while the *Stevenson* patent does disclose the use of a sensor probe, this probe is not analogous to Applicant's claimed insert electrode device in that it does not include the claimed

combination of a safety adapter that is coupled to an end of a protective tube that is outside a container.

The Examiner alleges that the *Stevenson* patent shows a probe 24 that is connected to a tube 14 via a constriction 15 of a threaded connection as well as alleged that the sensor probe fastens into an abuts against. This structural configuration is alleged to engage a recess of the sensor probe and reach over a step of the sensor probe and secure the sensor probe against axial movement. These statements appear wholly conclusory as the *Stevenson* patent makes no mention of recess in the sensor probe or a step over which the sensor probe reaches and secures the sensor probe against axial movement as recited in Applicant's claim. Moreover, Applicant respectfully submits that one of ordinary skill would not reasonably interpret the *Stevenson* patent as disclosing Applicant's claimed embodiment. Accordingly, withdrawal of this rejection is respectfully requested.

In numbered paragraph 20 on page 6 of the Office Action, claims 5 and 11-14 stand rejected under 35 U.S.C. §103(a) as for alleged unpatentability over the *Stevenson* patent in view of Applicant's alleged admitted prior art. Applicant respectfully traverses this rejection.

Because these claims variously depend from independent claim 1, Applicant respectfully submits that they are allowable by virtue of the preceding discussion and further distinguishable over the applied art by the additional elements recited therein. For these reasons, a *prima facie* case of obviousness has not been established and withdrawal of this rejection is respectfully requested.

Applicant appreciates the Examiner's acknowledgement in numbered paragraph 23 on page 6 of the Office Action that claims 9, 10, 15, and 16 recite allowable subject matter.

Applicant has added claim 17 and requests that favorable consideration and allowance be given, since the combined features as recited are not disclosed in the applied features.

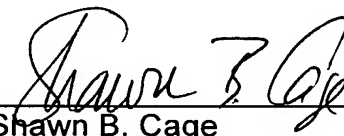
Based on at least the foregoing amendments and remarks, Applicant submits that claims 1-17 are allowable, and this application is in condition for allowance. Accordingly, Applicant requests a favorable examination and consideration of the instant application. In the event the instant application can be placed in even better form, Applicant requests that the undersigned attorney be contacted at the number below.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

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By:


Shawn B. Cage
Registration No. 51522

P.O. Box 1404
Alexandria, VA 22313-1404
703 836 6620